

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SCOT H. ATWOOD, Individually and on Behalf of All
Others Similarly Situated,

Plaintiff,

v.

INTERCEPT PHARMACEUTICALS, INC., MARK
PRUZANSKI and DAVID SHAPIRO,

Defendants.

No. 1:14-cv-01123-NRB

ECF Case

GEORGE BURTON, Individually and on Behalf of All
Others Similarly Situated,

Plaintiff,

v.

INTERCEPT PHARMACEUTICALS, INC., MARK
PRUZANSKI and DAVID SHAPIRO,

Defendants.

No. 1:14-cv-01373-NRB

ECF Case

**NOTICE OF MOTION AND MOTION OF LEE MUI LENG FOR CONSOLIDATION
OF RELATED CASES, APPOINTMENT AS LEAD PLAINTIFF AND APPROVAL OF
LEAD COUNSEL**

TO THE CLERK OF THE COURT AND ALL PARTIES AND THEIR RESPECTIVE ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that plaintiff Lee Mui Leng (“Movant”) respectfully moves this Court, for an order (a) consolidating the above-captioned cases, (b) appointing Lee Mui Leng as lead plaintiff in the consolidated action pursuant to the Private Securities Litigation Reform Act of 1995 (“PSLRA”), 15 U.S.C. §78u-4, and (c) approving Movant’s selection of Glancy Binkow & Goldberg LLP as lead counsel for the Class.

Movant seeks consolidation, appointment as lead plaintiff and approval of lead plaintiff’s choice of counsel pursuant to the Securities Exchange Act of 1934, the Federal Rules of Civil Procedure and the PSLRA. This motion is based on this Notice, the attached memorandum of law, the declaration of Gregory B. Linkh, and the Court’s complete files and records in this action, as well as such further argument as the Court may allow at a hearing on this motion.

This motion is filed pursuant to Section 21D of the Securities Exchange Act of 1934, as amended by the PSLRA. This Section provides that within 60 days after publication of the required notice, any member of the proposed class may apply to the Court to be appointed as lead plaintiff. Consequently, Movant has no way of knowing who, if any, the competing lead plaintiff candidates are at this time. As a result, Movant has been unable to conference with any opposing party as prescribed by this Court’s Individual Practices, and respectfully requests that the Court’s pre-motion conference requirement be waived for purposes of this motion.

Respectfully submitted,

DATED: April 22, 2014

GLANCY BINKOW & GOLDBERG LLP

By: s/ Gregory B. Linkh
Gregory B. Linkh (GL 0477)
Brian P. Murray (BM 9954)
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-and-

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Proposed Lead Counsel

**PROOF OF SERVICE BY ELECTRONIC POSTING
PURSUANT TO SOUTHERN DISTRICT OF NEW YORK
ECF AND LOCAL RULES AND BY MAIL
ON ALL KNOWN NON-REGISTERED PARTIES**

I, the undersigned, say:

I am a citizen of the United States and am employed in the office of a member of the Bar of this Court. I am over the age of 18 and not a party to the within action. My business address is 122 East 42nd Street, Suite 2920, New York, New York 10168.

On April 22, 2014, I caused to be served the following documents:

- 1. NOTICE OF MOTION AND MOTION OF LEE MUI LENG FOR CONSOLIDATION OF RELATED CASES, APPOINTMENT AS LEAD PLAINTIFF AND APPROVAL OF LEAD COUNSEL**
- 2. MEMORANDUM OF LAW IN SUPPORT OF MOTION OF LEE MUI LENG FOR CONSOLIDATION OF RELATED CASES, APPOINTMENT AS LEAD PLAINTIFF AND APPROVAL OF LEAD COUNSEL**
- 3. DECLARATION OF GREGORY B. LINKH IN SUPPORT OF MOTION OF LEE MUI LENG FOR CONSOLIDATION OF RELATED CASES, APPOINTMENT AS LEAD PLAINTIFF AND APPROVAL OF LEAD COUNSEL**

By posting the document electronically to the ECF website of the United States District Court for the Southern District of New York, for receipt electronically by the parties listed on the attached Court's Service List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on April 22, 2014, at New York, New York.

s/ Gregory B. Linkh
Gregory B. Linkh

Mailing Information for a Case 1:14-cv-01123-NRB

Electronic Mail Notice List

The following are those who are currently on the list to receive e-mail notices for this case.

- **Michael G. Bongiorno**
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Manual Notice List

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

- (No manual recipients)

Mailing Information for a Case 1:14-cv-01373-NRB

Electronic Mail Notice List

The following are those who are currently on the list to receive e-mail notices for this case.

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